



March 3, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Written Ex Parte Presentation in IB Docket No. 95-91, WT Docket
No. 07-293, and GN Docket Nos. 09-47, 09-51, and 09-137

Dear Ms. Dortch:

On behalf of the members of the Alliance of Automobile Manufacturers (Alliance) who are BMW Group, Chrysler LLC, Ford Motor Company, General Motors LLC, JaguarLandRover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, and Volkswagen, submits the following comments for your consideration regarding potential changes to the WCS band that could have a detrimental effect on satellite radio service, which is offered on many vehicles sold by Alliance members.

Satellite radio has proven to be an extremely popular feature for automobile buyers who enjoy the variety of programming as well as the high-quality audio that satellite radio offers. A large percentage of new vehicles currently ship with a satellite radio installed and that percentage is expected to increase in the coming years.

As the FCC moves ahead in crafting its National Broadband Plan, the Alliance understands the importance of identifying additional spectrum to help satisfy the country's broadband needs. However, the FCC should not try to meet that need by changing rules for the 2.3 GHz Wireless Communications Service ("WCS") to allow mobile transmissions in that band. Operating on frequencies immediately adjacent to millions of satellite radios, WCS transmissions would create a significant potential risk of interference to in-vehicle reception.

We urge the FCC to be cautious and ensure that satellite radio is not degraded by changing the established rules for WCS operations. Alliance members and other automakers have installed tens of millions of satellite radios in their vehicles with that same understanding. Unlike cell phones, automobiles are not discarded every year or two – these satellite radios will remain operational and in circulation for years to come.

Any loosening of the WCS rules must not cause interference to satellite radio consumers. Regulating to minimize interference is, of course, one of the FCC's primary statutory obligations, and we expect that the Commission will execute its role with appropriate technical diligence. Satellite radio is unique among FCC-regulated entities and requires different levels of protection from that provided to cell phones. We ask that the Commission keep in mind the following facts:

BMW Group • Chrysler Group LLC • Ford Motor Company • General Motors LLC • Jaguar Land Rover • Mazda
Mercedes-Benz USA • Mitsubishi Motors • Porsche • Toyota • Volkswagen

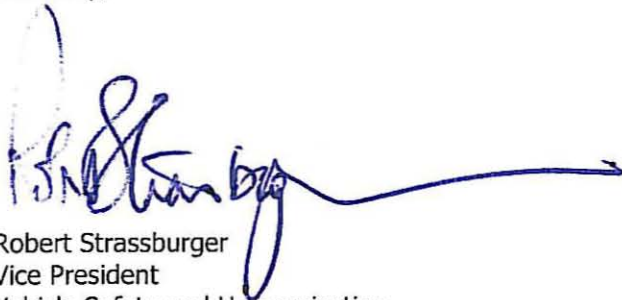
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- Satellite radio represents an extremely dense concentration of customers in a narrow frequency band (nearly 40 million listeners in 25 MHz, listening over 20 hours per week on average), thus amplifying the impact of any interference or signal degradation.
- Unlike cell phone service where momentary blips or degradation are easily overcome, satellite radio provides high-quality audio and music; drop-outs and interruptions are neither expected nor tolerated by subscribers, in large part because competing audio services typically provide error-free service.
- Satellite radio originates from space-based platforms that provide a relatively low-powered signal to receivers tens of thousands of miles away (thus necessitating receivers more susceptible to impairment from out-of-band emissions). The satellite signal strength cannot be augmented or increased by terrestrial means in most areas of the country.
- Unlike mobile handheld devices, most satellite radio antennas are located on top of vehicles and are typically unshielded (thus providing less protection from sources of interference).

Finally, we urge you to give the public the opportunity to review and comment on specific rules addressing changes to the WCS rules before the Commission adopts those rules. A comment period provides transparency in the conduct of Commission proceedings and helps ensure that your actions in this matter will fully protect the millions of consumers who rely on satellite radio in their automobiles.

Thank you for considering our views and recommendations and we will continue to review the docket for this proceeding.

Sincerely,



Robert Strassburger
Vice President
Vehicle Safety and Harmonization

cc: The Honorable Julius Genachowski
The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Mignon Clyburn
The Honorable Meredith Attwell Baker
Mr. Julius Knapp
Mr. Blair Levin